

**REMARKS**

By this Amendment, Applicants have amended claims 33, 44, 48, 59, and 64, and cancelled claims 45 and 60 without prejudice or disclaimer of their subject matter. Upon entry of this Amendment, claims 33, 36-44, 48, 51-59, 63, and 64 remain pending and under current examination. In the Final Office Action, the Examiner took the following actions:

- (a) objected to claims 44, 45, 59, and 60 under 35 U.S.C. § 112, fourth paragraph, for informalities;
- (b) rejected claims 33, 36, 37, 39, 41-45, 48, 51, 52, 54, 56-60, and 63 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Application Publication No. 2004/0066756 A1 ("Ahmavaara") in view of technical standard Diameter Base Protocol ("Technical Standard");
- (c) rejected claims 38 and 53 under 35 U.S.C. § 103(a) as being unpatentable over Ahmavaara in view of Technical Standard, and in further view of U.S. Patent No. 6,421,339 B1 ("Thomas");
- (d) rejected claims 40 and 55 under 35 U.S.C. § 103(a) as being unpatentable over Ahmavaara in view of Technical Standard, and in further view of U.S. Patent No. 6,728,536 B1 ("Basilier"); and
- (e) rejected claim 64 under 35 U.S.C. § 103(a) as being unpatentable over Ahmavaara in view of Technical Standard, Thomas, and Basilier.

Applicants respectfully traverse the objection and rejections for the following reasons.

**Objection to Claims 44, 45, 59, and 60 under 35 U.S.C. § 112, Fourth Paragraph**

The Examiner objected to claims 44, 45, 59, and 60 for informalities because they allegedly fail to further limit the independent claims. In response to these

rejections, and without conceding to the Examiner's allegations, Applicants have amended claims 44 and 59, and cancelled claims 45 and 60 without prejudice or disclaimer of their subject matter.

Claim 33 recites, in part, that "supported visited networks comprise[] a proxy/relay agent." Claim 44, which depends from claim 33, additionally recites "including in said access network a proxy/relay agent." Similarly, claim 48 recites, in part, that "supported visited networks comprise[] a proxy/relay agent." Claim 59, which depends from claim 48, additionally recites "wherein said access network includes a proxy/relay agent." Accordingly, claims 44 and 59 further limit claims 33 and 48, respectively. Therefore, Applicants deem the Examiner's objection to claim 44 and 59 overcome, and respectfully request its withdrawal.

**Rejection of claims 33, 36, 37, 39, 41-44, 48, 51, 52, 54, 56-59 and 63 under U.S.C. § 103(a)**

Applicants request reconsideration and withdrawal of the rejection of claims 33, 36, 37, 39, 41-44, 48, 51, 52, 54, 56-59 and 63 under 35 U.S.C. § 103(a) as being unpatentable over Ahmavaara in view of Technical Standard.

The Examiner admitted that Ahmavaara does not teach the claimed "redirecting to all said supported visited networks the authentication requests whose realm does not correspond to any realm identified at said access network; and returning from said supported visited networks to said access network redirect notifications as well as contact information to said user's respective home operator," as recited in Applicants' previously submitted independent claim 33 (with similar recitations in previously submitted independent claim 48). See Final Office Action, pp. 6-7. The amendments to

claims 33 and 48 presented herein do not change the fact that Ahmavaara also does not teach or suggest the similar recitations in currently amended claims 33 and 48.

The Examiner then alleged that Technical Standard cures the deficiencies of Ahmavaara. However, Technical Standard also does not teach or suggest at least Applicants' claimed:

... searching in a routing table for a realm identified by the realm-identification component, wherein when the realm is not included in the routing table, further performing the steps of:

redirecting to all said supported visited networks the user credentials whose realm-identification component does not correspond to any realm identified in the routing table . . . .

as recited in amended claim 33 (with similar recitations in amended claim 48).

Instead, Technical Standard teaches that "[t]he message is forwarded by the NAS to its relay, DRL, which does not have a routing entry in its Diameter Routing Table for example.com. DRL has a default route configured to DRD, which is a redirect agent that returns a redirect notification to DRL, as well as HMS' contact information." Technical Standard, p. 27. Thus, Technical Standard teaches a system that forwards a message to a relay. When a routing entry for the message is not in the relay's table, a request is sent to a default redirect agent. This default redirect agent returns the necessary contact information. See *Id.* Therefore, Technical Standard does not teach or suggest at least the above-quoted portion of amended claim 33 (with similar recitations in amended claim 48). That is, Technical Standard does not teach or suggest Applicants' claimed "when the realm is not included in the routing table, . . . redirecting to all said supported visited networks."

Moreover, Applicants' specification clearly explains this deficiency of Technical Standard. Applicants' specification states that the invention provides for "certain modifications being made in the way specific Diameter [*i.e.* Technical Standard] requests are processed . . . ." Specification, p. 5, lines 4-6. Specifically, when "authentication requests have an unknown realm," in the prior art, "these requests would be discarded or, in the best case, would be forwarded towards a default authentication server." Specification, p. 5, lines 7-11. The Specification also distinguishes over Technical Standard, by disclosing the use of "routing table, which typically is realm-based is configured in such a way that all the authentication requests whose realm does not correspond to any of those present in the routing table are redirected to all the VauS/DRDs." Specification, p. 13, lines 4-8 (emphasis added).

Thus, Ahmavaara and Technical Standard, taken alone or in combination, do not render obvious Applicants' independent claims 33 and 48. In view of the reasoning presented above, Applicants therefore submit that independent claims 33 and 48 are not obvious and should therefore be allowable. Dependent claims 36, 37, 39, 41-44, 51, 52, 54, 56-59, and 63 should also be allowable at least by virtue of their dependence from non-obvious base claim 33 or 48. Accordingly, Applicants request withdrawal of the 35 U.S.C. § 103(a) rejection.

**Rejection of Claims 38 and 53 under 35 U.S.C. § 103(a)**

Applicants request reconsideration and withdrawal of the rejection of claims 38 and 53 under 35 U.S.C. § 103(a) as being unpatentable over Ahmavaara in view of Technical Standard, and in further view of Thomas.

As discussed in the previous section, the cited references do not render obvious Applicants' independent claims 33 and 48. In particular, the cited references do not

teach or suggest at least the previously quoted elements of Applicants' independent claims 33 and 48. The Examiner's addition of Thomas as to dependent claims 38 and 53 does not alter the reasoning presented in the previous section. For example, Thomas, which is directed towards configuring packets for roaming calls on a foreign network (see Thomas, Abstract and Summary of the Invention), does not cure the aforementioned deficiencies of Ahmavaara and Technical Standard.

For at least the above reasons, Applicants' dependent claims 38 and 53 are also non-obvious and should be allowable at least by virtue of their respective dependence from base claim 33 or 48. Applicants therefore request withdrawal of the 35 U.S.C. § 103(a) rejection.

**Rejection of Claims 40 and 55 under 35 U.S.C. § 103(a)**

Applicants request reconsideration and withdrawal of the rejection of claims 40 and 55 under 35 U.S.C. § 103(a) as being unpatentable over Ahmavaara in view of Technical Standard, and in further view of Basilier.

As discussed previously herein, the cited references do not render obvious Applicants' independent claims 33 and 48. In particular, the cited references do not teach or suggest at least the previously quoted elements of Applicants' independent claims 33 and 48. The Examiner's addition of Basilier as to dependent claims 40 and 55 does not alter the reasoning presented in the previous section. For example, Basilier, which discloses a method for transmitting specific information between a home and visiting network (see Basilier, Abstract and Summary of the Invention), does not cure the aforementioned deficiencies of Ahmavaara and Technical Standard.

For at least the above reasons, Applicants' dependent claims 40 and 55 are also non-obvious and should be allowable at least by virtue of their respective dependence

from base claim 33 or 48. Applicants therefore request withdrawal of the 35 U.S.C. § 103(a) rejection.

**Rejection of Claim 64 under 35 U.S.C. § 103(a)**

Applicants request reconsideration and withdrawal of the rejection of claim 64 under 35 U.S.C. § 103(a) as being unpatentable over Ahmavaara in view of Technical Standard, in view of Thomas, and in further view of Basilier.

As discussed previously herein, the cited references do not render obvious Applicants' independent claims 33 and 48. In particular, the cited references do not teach or suggest at least the previously quoted elements of Applicants' independent claims 33 and 48. The Examiner's addition of Thomas or Basilier as to dependent claim 64 does not alter the reasoning presented in the previous section.

For at least the above reasons, Applicants' dependent claim 64 is also non-obvious and should be allowable at least by virtue of its dependence from base claim 33. Applicants therefore request withdrawal of the 35 U.S.C. § 103(a) rejection.

**Conclusion**

Applicants request reconsideration of the application and withdrawal of the objections and claim rejections. Pending claims 33, 36-44, 48, 51-59, 63, and 64 are in condition for allowance, and Applicants request a favorable action.

If there are any remaining issues or misunderstandings, Applicants request the Examiner telephone the undersigned representative to discuss them.

Please grant any extensions of time required to enter this response and charge any additional required fees to Deposit Account 06-0916.

Respectfully submitted,

FINNEGAN, HENDERSON, FARABOW,  
GARRETT & DUNNER, L.L.P.

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By: 

David M. Longo  
Reg. No. 53,235

/direct telephone: (571) 203-2763/